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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA

Case No. 3:22-cr-00084-SI

v.

**STIPULATED MOTION FOR
PROTECTIVE ORDER**

TONY DANIEL KLEIN,

Defendant.

The United States hereby moves for an order pursuant to Rule 16(d)(1), Fed. R. Crim. P., to prevent the dissemination or misuse of discovery material containing potentially sensitive or confidential images relating to Coffee Creek Correctional Facility, as further defined in the Stipulated Protective Order. The proposed order was drafted in coordination with the Oregon Department of Justice. Defense counsel joins in this request.

Stipulated Motion for Protective Order

Page 1
Revised March 2018

For the reasons stated in the Stipulated Protective Order, the parties respectfully request that the Court enter the proposed Protective Order.

Dated: February 17, 2023

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Gavin W. Bruce
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Assistant United States Attorney

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ASSISTANT ATTORNEY GENERAL

/s/ Cameron A. Bell
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